EXHIBIT 2

```
Page 1
1
             IN THE UNITED STATES DISTRICT COURT
         FOR THE EASTERN DISTRICT OF NORTH CAROLINA
 2
                      SOUTHERN DIVISION
                       NO. 7:23-CV-897
 3
     IN RE:
                                     )
 4
     CAMP LEJEUNE WATER LITIGATION )
 5
     This Document Relates to:
6
     ALL CASES
7
8
9
                  VIDEOTAPED DEPOSITION OF
10
             ALEXANDROS SPILIOTOPOULOS, PH.D.,
11
     a witness herein, called by the Plaintiffs for
     examination, taken by and before Ann Medis, RPR, CLR,
12
     CSR-WA, and Notary Public in and for the Commonwealth
     of Pennsylvania, via Zoom Videoconference, at the
13
     offices of Department of Justice Civil Litigation 1100
     L Street NW, Washington, DC 20005, on Tuesday,
     March 18, 2025, commencing at 9:22 a.m.
14
15
16
17
18
19
20
21
2.2
2.3
24
2.5
```

```
Page 2
                   APPEARANCES
1
    On behalf of Plaintiff
2
3
               WEITZ & LUXENBERG, P.C.
                    LAURA J. BAUGHMAN, ESQUIRE
                    DEVIN BOLTON, ESQUIRE
4
               700 Broadway
5
               New York, New York
                                    10003
               212.558.5915
               lbaughman@weitzlux.com
6
               dbolton@weitzlux.com
7
    On behalf of Defendant United States of America
8
9
               U.S. DEPARTMENT OF JUSTICE
               BY:
                    HAROON ANWAR, ESQUIRE
10
                    KAILEY SILVERSTEIN, ESQUIRE
                    GIOVANNI ANTONUCCI, ESQUIRE
11
               1100 L Street NW
               Washington, DC
                                20005
12
               202.552.9843
               haroonanwar@usdoj.gov
13
               silversteinkai@usdoj.gov
               antonuccigio@usdoj.gov
14
15
    Also present via Zoom
    Jeff Davis
16
    Allison O'Leary
17
    Deanna Havai
    Leonard Konikow
    Morris Maslia
18
    Remy Hennet
19
20
    April Carter, videographer
21
2.2
2.3
24
25
```

Did I read that correctly?

A. Yes.

1

2

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

19

2.0

21

22

23

24

25

Q. So the ATSDR stated that its water modeling results can be used in combination with information from the mother on her water use to estimate the level and duration of her exposure to these contaminants; right?

MR. ANWAR: Object to form.

THE WITNESS: No. It clearly says it was to be used by the epidemiological study to estimate the level and duration of exposures to the mother. But there are caveats with respect to that.

BY MS. BAUGHMAN:

- Q. Is that a caveat right there?
- A. This is not the only quote in my opinions regarding what that did. This is just one piece. You cannot take it out of context.
- Q. Does this not say that the ATSDR's work, the monthly mean concentrations can be used by the epidemiological study to estimate the level and duration of exposures to the mother? It says that; right?

MR. ANWAR: Object to form.

THE WITNESS: Even though that is said

Page 4 of 9

- 1 | there, Mr. Maslia has also provided responses to
- 2 | the expert panel, for example, with respect to how
- 3 | the results of these analyses will be used or the
- 4 level of detail that would be required. Then, in
- 5 | fact, he said things like medium, high, medium,
- 6 low rather than actual values, detailed
- 7 concentrations.
- 8 So there is a caveat here with respect
- 9 to how that should be interpreted.
- MS. BAUGHMAN: I'm going to object as
- 11 | nonresponsive.
- 12 BY MS. BAUGHMAN:
- Q. Let me ask you this: Have you reviewed
- 14 | the published epidemiology studies regarding Camp
- 15 Lejeune?
- 16 A. I have not.
- 17 Q. Do you know whether in any of the
- 18 published epidemiology studies they document that
- 19 the epidemiologist used the modeling in order to
- 20 calculate the level and duration of exposure to
- 21 | contaminants?
- MR. ANWAR: Object to form.
- 23 BY MS. BAUGHMAN:
- Q. Do you know whether it says that in the
- 25 published studies?

Page 5 of 9

| 7\ | NT ~ | h | | | - la | ~ |
|----|------|----------|-------|------|-------------|---------|
| Α. | No. | nave | 110 L | read | tnose | studies |

Do you know if the ATSDR epidemiologists 0. actually used ATSDR modeling of the historical concentration -- strike that.

Do you know if ATSDR epidemiologists had used the mean monthly levels of contaminants predicted by ATSDR's models to calculate the cumulative exposure for any individuals who lived at Camp Lejeune?

MR. ANWAR: Object to form.

THE WITNESS: I do not know that. T'm not familiar with the epidemiological studies at Camp Lejeune.

BY MS. BAUGHMAN:

1

2

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

19

2.0

21

22

23

24

25

So if the modeling was sent to support the epidemiology studies and the epidemiologists used the modeling to calculate cumulative exposer to individuals, you don't know that; right?

MR. ANWAR: Object to form, foundation.

THE WITNESS: My work here is only to critique the quality of the modeling work and outcome of that modeling.

BY MS. BAUGHMAN:

So you don't know whether ATSDR's work was used for the purpose of making exposure

Page 6 of 9

- 1 assessments in individuals? You don't know either way, do you? 2
- 3 MR. ANWAR: Object to form and foundation. 4
- BY MS. BAUGHMAN: 5
- By the ATSDR epidemiologists. Do you 6 0. know? 7
- This is irrelevant to my opinions on 8 Α. 9 this matter.
- 10 MS. BAUGHMAN: I'm going to object as 11 nonresponsive.
- BY MS. BAUGHMAN: 12

13

14

15

16

17

18

19

2.0

21

22

23

24

25

- Page 23 of your report, you chose to put Ο. in your report a statement about this work being to support and epidemiologic study and not for purpose of making exposure assessments in individuals. You included that in your report; right?
- I included that in my report because it provides context with respect to how this work was done, what it was intended to do, what the timeframe of that was and, therefore, support my work in looking at whether the modeling work that was done provided good results to rely on and support such evaluations.

| Q. Can you tell me whether or not the ATSDR |
|---|
| epidemiologist used the ATSDR's mean monthly |
| concentrations from the modeling in order to make |
| exposure assessments in individuals? Do you know |
| whether they did that? Yes or no. |

MR. ANWAR: Object to form and foundation.

THE WITNESS: I do not know that, but it's not relevant to work that I did and the opinions that I provide.

MS. BAUGHMAN: I'll object as nonresponsive to everything after "I do not know that."

BY MS. BAUGHMAN:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

2.0

21

22

23

24

25

- Did you do any research to determine how ATSDR's modeling studies were used by the epidemiologists?
 - That was not my role in this case. Α.
- Your report at 25 on a similar subject Ο. here, the last sentence on the first paragraph, you've written, "ATSDR further acknowledged this uncertainty by stating, " quote, "'ATSDR's exposure assessment cannot be used to determine whether you or your family suffered any health effects as a result of past exposures to contaminated water at

- 1 Camp Lejeune. '"
- 2 You put that quote in your report;
- 3 right?

5

6

7

8

9

10

- 4 Α. Yes.
 - And you're citing there two documents Q. including ATSDR had Hadnot Point Chapter A; right?
 - Α. Looks about right.
 - Q. Yes?
 - Α. Yes.
 - (Spiliotopoulos Exhibit 9 was marked.)
- 11 BY MS. BAUGHMAN:
- 12 I'm handing you what's marked as Ο. Exhibit 9 to your deposition, which is Chapter A, 13 14 Summary and Findings from Hadnot Point. That's 15 the document that you cited there; correct?
- 16 Α. Yes.
- 17 Let's turn to the page you cited page O. 18 The very first sentence under the bolded 19 statement is your quote, right, what you quoted? 2.0 But you left out a word, didn't you? What the 21 ATSDR wrote was "ATSDR's exposure estimates cannot 22 be used alone to determine whether you or your 23 family suffered any health effects as a result of past exposure to TCE contaminated drinking water 24

at U.S. Military Base Camp Lejeune." Right?

25

Page 9 of 9